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March 32, 2014

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street- Courtroom 9A
New York, New York 10007

Re: Tymoshenko v. Firtash et al
Index No. 11 Civ. 02794 (KMW)

Dear Judge Wood:

The undersigned counsel is the principal attorney with the law firm of McCallion & Associates LLP, counsel for the plaintiffs in the above-referenced matter.

A motion to dismiss plaintiffs' Second Amended Complaint is currently pending before the Court. This motion was filed by defendants Barbara Ann Holdings LLC, CMZ Ventures, LLC, Paul J. Manafort, The Dynamic Group, Brad S. Zackson and Vulcan Properties.

Following the recent change of government in Ukraine, certain documents have come to light that, upon information and belief, will provide plaintiffs with significant additional evidentiary support with regard to the legal issues raised in the pending motion to dismiss. These documents may also serve as the basis for a request by the plaintiffs to further amend their pleadings.

Plaintiffs respectfully request that they be granted a 90 day period to provide the Court with further support for their opposition to the pending motion to dismiss and/or plaintiffs' application to further amend their pleadings. The various collections of documents currently being reviewed in Kiev are voluminous, and they are at multiple locations. In addition, many of the documents are in a damaged condition, due, among other reasons, to the fact that many of them were recovered from lake and river locations, following attempts by former government officials to dispose of them. The documents are also, for the most part, in Ukrainian and/or Russian, so they need to be officially translated into English.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Kenneth F. McCallion

cc: All other counsel